

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11,
2001

03 MDL 1570 (GBD) (FM)
ECF Case

This document relates to:

Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al., 04-CV-1076 (GBD)

**The O'Neill Plaintiffs' Motion to Proceed Under 28 U.S.C. § 1605A as Against the
Iran Defendants**

PLEASE TAKE NOTICE that upon the affidavit of Jerry S. Goldman, Esq., and the exhibits attached thereto, the O'Neill Plaintiffs, by and through their counsel, Anderson Kill, P.C., will move the Court before the Honorable George B. Daniels, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an Order granting Plaintiffs' motion to amend their complaint solely as against the Islamic Republic of Iran, the Iranian Ministry of Intelligence and Security, the Iranian Minister of Intelligence and Security Ali Fallahian, the Iranian Revolutionary Guard Corps, the Iranian Revolutionary Guard Corps – Qods Force, Ayatollah Ali Hoseini-Khamenei, and Deputy Commander Brigadier General of the Iranian Revolutionary Guard Corp. Mohammed Baqr Zalqadr (collectively the "Iran Defendants"), to proceed under 28 U.S.C. § 1605A, and confirming that service of the amended complaint on the Iran Defendants is not required.

Dated: August 11, 2015
New York, New York

/s/ Jerry S. Goldman
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